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## **Attorney for Mr. Ricardo Flores**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
**(HONORABLE JOHN A. HOUSTON)**

UNITED STATES OF AMERICA, ) CASE NO. 07CR3471-JAH  
v. )  
Plaintiff, ) DATE: January 22, 2008  
RICARDO FLORES ) TIME: 8:30 a.m.  
Defendant. ) NOTICE OF MOTIONS AND  
 ) MOTIONS:  
 ) (1) TO COMPEL DISCOVERY;  
 ) (2) FOR LEAVE TO FILE  
 ) FURTHER MOTIONS

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TO: KAREN P. HEWIT, UNITED STATES ATTORNEY, AND  
JOSEPH ORABANO, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that on January 22, 2008, at 8:30 a.m. or as soon thereafter as counsel may be heard, the defendant, Ricardo Flores, by and through counsel, Zandra Lopez, will ask this Court to enter an order granting the following motions.

## MOTIONS

The defendant, Ricardo Flores, by and through counsel, Zandra Lopez, pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law and local rules, hereby moves this Court for an order:

- 1       1) to compel discovery; and,  
2       2) for leave to file further motions.

2       These motions are based upon the instant motions and notice of motions, the attached  
3       statement of facts and memorandum of points and authorities, and all other materials that  
4       may come to this Court's attention at the time of the hearing on these motions.  
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6       Respectfully submitted,

7                                  //s// Zandra L. Lopez  
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Dated: January 15, 2008

**ZANDRA L. LOPEZ**  
9       Attorney for Mr. Flores

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